

A.C. 42602	:	STATE OF CONNECTICUT
	:	
MERIBEAR PRODUCTIONS, INC.	:	APPELLATE COURT
D/B/A MERIDITH BAER AND ASSOCIATES	:	
	:	
v.	:	
	:	
JOAN E. FRANK et al.	:	FEBRUARY 7, 2020

### **MOTION FOR EXTENSION OF TIME**

Pursuant to Practice Book § 66-1, Defendant-Appellants move for an extension of seven (7) days, to Friday, February 14, 2020 to file their reply brief, currently due on February 7, 2020. Opposing counsel **consents** to the granting of this extension. This is the Defendant-Appellants' second request for an extension of time to file this brief.

#### **I. Brief History**

On October 14, 2014, the Superior Court for the Judicial District of Fairfield at GA #2 Bridgeport, *Tyma, J.*, entered judgment in favor of the Plaintiffs. The Defendants appealed and argument was heard by this Court, which upheld the ruling of the trial court in a decision released on May 10, 2016. (156 Conn. App. 305, rev'd, 328 Conn. 709 (2016)). The Defendants filed a petition for certification, which was granted by the Supreme Court on June 21, 2016. (322 Conn. 903) That Court subsequently heard argument and rendered its decision on May 15, 2018, ordering that the appeal be dismissed for lack of a final judgment. (328 Conn 709 (2018)).

The matter then returned to the trial court, where judgment was rendered. The Defendants filed the current appeal on February 15, 2019. On February 22, 2019 the Plaintiff moved to dismiss the appeal. Defendants objected to that Motion and, on March 8, 2019, filed in addition a motion for permission to file a late appeal. On June 26, 2019, this

Court denied the Plaintiff's Motion and granted Defendants' Motion. On October 15, 2019, the Court issued a memorandum detailing the bases for its decision on those motions.

Defendants' brief currently is due to be filed on February 7, 2020.

## II. Specific Facts

Undersigned Counsel requests the extension of 30 days due to current outstanding work in the Superior and Appellate Courts. Undersigned counsel is currently working on motions in *Claridge Associates, LLC et al. v. Pursuit Partners LLC et al.*, FST-CV15-6026069-S, *Claridge Associates, LLC et al. v. Canelas, Ruth et al.*, FST-CV19-6043285-S, and *Alpha Beta Capital Partners v. Pursuit Investment Management*, FST-CV15-5014970-S.

In addition, undersigned counsel is currently working on settlement of a matter in the United States Court of Appeals for the Second Circuit, *Rebecca M. Murillo v. A Better Way Wholesale Autos, Inc.* 19-2537. Undersigned counsel anticipates that an additional 7 days will provide enough time to adequately complete and file a reply brief in this matter.

## III. Legal Basis

Practice Book § 66-1(c) authorizes extensions of filing deadlines for good cause shown. The facts set forth herein demonstrate good cause.

DEFENDANTS,  
JOAN E. FRANK AND GEORGE FRANK

By: 

Michael S. Taylor  
HORTON, DOWD, BARTSCHI & LEVESQUE, P.C.  
90 Gillett Street  
Hartford, CT 06105  
Tel: (860) 522-8338  
Fax: (860) 728-0401  
[mtaylor@hdblfirm.com](mailto:mtaylor@hdblfirm.com)

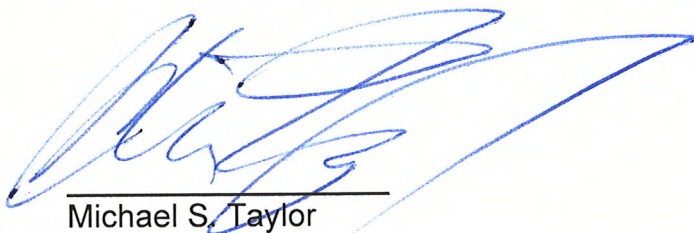
### CERTIFICATION

I certify in accordance with the provisions of § 62-7 and that (1) on February 7, 2020 a copy was delivered to counsel of record listed below; (2) the document has been redacted or does not contain any names or other personal identifying information or case law; and (3) that the document complies with all applicable rules of appellate procedure.

I certify in accordance with the provisions of § 66-1(b) that a copy of this motion has been delivered to each of my clients who are parties to the appeal.

Anthony J. Labella  
Ury & Moskow, LLC  
883 Black Rock Turnpike  
Fairfield, CT 08625  
(203) 610-6393  
(203)610-6399 – fax  
[anthony@urymoskow.com](mailto:anthony@urymoskow.com)

Christopher Charles Vaughn  
160 Fairfield Woods Road,  
Suite 14  
Fairfield, CT 06825  
Phone: (203) 515-7626  
Fax: (203) 333-0751  
[ccvaugh@gmail.com](mailto:ccvaugh@gmail.com)



Michael S. Taylor